

JOSEPH B. SALA, Ph.D.

1 warnings on guarding devices or machines?

2 A. No, not specifically.

3 Q. Any other articles in that binder that
4 you've written?

5 A. No, I don't believe so.

6 Q. The first textbook chapter that you
7 referenced that you were a co-author of, did it
8 deal with machine guarding?

9 A. I don't believe that it deals with
10 machine guarding specifically, no.

11 Q. Did it deal in any way, shape or form
12 in rendering equipment?

13 A. No, not specifically.

14 Q. When I say "rendering equipment," what
15 does that mean to you?

16 A. I believe that, at least my
17 understanding for the questions that you're asking
18 here today, is similar to the industry in the
19 piece of equipment that we're here talking about,
20 the Supercookor.

21 Q. Have you ever written any articles
22 that deal with rendering equipment?

23 A. No, I have not.

24 Q. Have you written any articles that

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Exhibit 3

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1 deal with machine guarding?

2 A. I don't believe my publications are
3 specific to machine guarding, no.

4 Q. Have you ever been hired -- is it --
5 the term litigation consultant? Is that what
6 you -- the term you use?

7 A. Well, I'm a consultant. Some of the
8 work that I do is in the litigation arena, yes.

9 Q. In the litigation cases you've been
10 involved in, have you -- have any of them dealt
11 with rendering equipment?

12 A. I believe this is the first case
13 involving rendering equipment.

14 Q. Have you been hired as an expert in
15 litigation involving machine guarding?

16 A. Human factors aspects related to
17 machine guarding, yes.

18 Q. How many machine guarding cases have
19 you been involved in?

20 A. I don't have a -- a -- a number for
21 you.

22 Q. More than five or less than five?

23 A. I would think more than five.

24 Q. More than ten or less than ten?

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